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August 13, 2024



## **VIA ECF**

The Honorable Katherine Polk Failla United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

Petróleos de Venezuela, S.A. et al. v. MUFG Union Bank, N.A. et al., No. 1:19-cv-10023

Dear Judge Failla:

We write on behalf of the Trustee and the Collateral Agent regarding the Court's Order of July 19, 2024, ECF No. 312, directing the parties to meet and confer regarding supplemental briefing and to file a joint letter by July 31, 2024, and the Court's subsequent Order of July 31, 2023, ECF No. 315, granting the Parties' request for an extension until August 14, 2024.

Since this Court's order, the parties have continued to discuss the scope and timing of supplemental submissions, and the Trustee and the Collateral Agent believe that it would be beneficial to extend the deadline for the parties' joint submission by two additional days. Among other things, the Trustee and the Collateral Agent wish to consider materials brought to their attention by the PDVSA Parties for the first time on Monday afternoon that the PDVSA Parties contend are relevant to the Venezuelan legal issues relevant to this case.

Accordingly, the Trustee and the Collateral Agent respectfully request that the deadline for the parties' joint letter be extended by two days, or until August 16, 2024. This is the second request for an extension. The PDVSA Parties consent to this request.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

The Honorable Katherine Polk Failla United States District Judge

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Respectfully submitted,

/s/ Jonathan H. Hurwitz

Jonathan H. Hurwitz

cc: Counsel of Record (Via ECF)

Application GRANTED. The parties shall submit the joint letter on or before **August 16**, **2024**.

The Clerk of Court is directed to terminate the pending motion at docket number 317.

Dated: August 14, 2024

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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